

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal no. 1:18-CR-308
	)	
MARKARA MAN,	)	The Honorable John F. Anderson
	)	
<i>Defendant.</i>	)	
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**CONSENT MOTION TO ALLOW PRO HAC VICE COUNSEL TO APPEAR FOR  
HEARING AND EXCUSE LOCAL COUNSEL FROM ATTENDING INITIAL  
APPEARANCE-CHANGE OF PLEA HEARING**

Local counsel Evan M. Lisull, on behalf of pro hac vice counsel Edward M. Robinson and defendant Markara Man, hereby seeks permission to be excused from the hearing set in this Court on August 31, 2018 at 3:00 p.m. This request is based on the following:

1. Mr. Edward Robinson was granted permission to appear pro hac vice on July 13, 2018. (Doc. 10).
2. The parties have been in negotiations to settle this matter. After much discussion, a settlement has been reached. This Court set August 31, 2018 as a date for initial appearance and change of plea for Mr. Man.
3. Local counsel, Evan M. Lisull, is out of the jurisdiction on a pre-paid family vacation and will not return until after August 31, the hearing date.
4. Counsel for the government, Assistant United States Attorney, Alexander P. Berrang, and Mr. Robinson have been exclusively engaged in the settlement negotiations. In order to effectuate this settlement, the parties have twice sought and received permission to extend time for the indictment.

5. Mr. Robinson has been practicing criminal defense for thirty years, primarily in United States District Courts and Courts of Appeal. He is an experienced attorney and is fully capable of representing Mr. Man at this hearing without the presence of local counsel.

6. Counsel for the government consented to the relief requested herein.

7. As such, to avoid delay, pursuant to Local Criminal Rule 57.4(F), I request that I be excused for the hearing set for August 31, 2018 and that Mr. Robinson be granted permission to appear without local counsel.

August 20, 2018

Respectfully Submitted,

By: /s/ Evan M. Lisull  
Evan M. Lisull (VBN 86194)  
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ATTORNEYS FOR DEFENDANT  
MARKARA MAN

## **CERTIFICATE OF SERVICE**

I hereby certify on this 20<sup>th</sup> day of August 2018 that I have electronically filed the Consent Motion using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Alexander P. Berrang  
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United States Attorney's Office  
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/s/ Evan M. Lisull

Evan M. Lisull